

VIA ECFS

April 24, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**EX PARTE FILING OF ENCINA COMMUNICATIONS CORPORATION
RE NOTICE OF PROPOSED RULE MAKING
ET DOCKET 18-295 UNLICENSED USE OF THE 6 GHZ BAND AND
EXPANDING FLEXIBLE USE IN MID-BAND SPECTRUM
GN DOCKET NUMBER 17-183**

Dear Ms. Dortch:

On April 24, 2019, I had a telephone conversation with Umair Javed, of Commissioner Rosenworcel's office.

We discussed that the two imperatives of the proceeding are:

- Expediently Proceed to a First Report and Order
- Protect Existing Licensees

Also, that both can be achieved by using industry proven procedures¹ to Prior Coordinate "Safe Areas" around urban, suburban, rural communities, therefore allowing the Commission to proceed expeditiously to a First Report and Order, which would provide unlicensed services to over 95% of the US population.

We also discussed that other² filers see Automatic Frequency Coordination as a gradually implemented solution with 9 steps over several years -- and even then their filing mentions "*the inevitable instance when an unlicensed RLAN device causes harmful interference with a licensed FS station...*".³ This fails to meet either of the imperatives, neither proceeding expeditiously nor providing 100% protection for existing licensees.

¹ TIA TSB10-F

² Ex parte filing of AT&T, Comsearch and Verizon, April 22, 2019

³ Ex parte filing of AT&T, Comsearch and Verizon, April 22, 2019, page 3, Section 9.

Respectfully submitted.

Michael Mulcay, Chairman & CTO
Encina Communications Corporation
6701 Democracy Boulevard, Suite 300
Bethesda, MD 201817
Telephone: 831-659-5618
Email: mike@encinacomm.com

Courtesy copies to:

Ajit Pai, Chairman, ajit.pai@fcc.gov
Michael O'Rielly, Commissioner, mike.orielly@fcc.gov
Brendan Carr, Commissioner, brendan.carr@fcc.gov
Jessica Rosenworcel, Commissioner, jessica.rosenworcel@fcc.gov
Geoffrey Starks, Commissioner, geoffrey.starks@fcc.gov
Julius P. Knapp, Chief OET, julius.knapp@fcc.gov
Rachael Bender, Office of Chairman Pai, rachael.bender@fcc.gov
Aaron Goldberger, Office of Chairman Pai, aaron.goldberger@fcc.gov
William Davenport, Office of Commissioner Starks, william.davenport@fcc.gov
Umair Javed, Office of Commissioner Rosenworcel, umair.javed@fcc.gov
Erin McGrath, Office of Commissioner O'Rielly, erin.mcgrath@fcc.gov
Will Adams, Office of Commissioner Carr, will.adams@fcc.gov